# ATTACHMENT A

Interrogatories to Moving Defendants

Interrogatories to Merchant Companies and Blue Rocket Brands (Identical Set Served on 56 Companies)

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12	Facsimile: 702-388-6787	
13	Email: blaine.welsh@usdoj.gov	
14	Attorneys for Plaintiff Federal Trade Commissi	on.
15		
1.0	UNITED STATES	DISTRICT COURT
16		
	DISTRICT	OF NEVADA
17	DISTRICT FEDERAL TRADE COMMISSION,	
17 18		OF NEVADA  Case No: 17-cv-02000-APG-GWF
17 18 19	FEDERAL TRADE COMMISSION,	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF
17 18 19 20	FEDERAL TRADE COMMISSION, Plaintiff,	Case No: 17-cv-02000-APG-GWF
17 18 19 20 21	FEDERAL TRADE COMMISSION,  Plaintiff,  v.	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT
17 18 19 20	FEDERAL TRADE COMMISSION,  Plaintiff,  v.  REVMOUNTAIN, LLC, et al.,  Defendants.	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT ABSOLUTELY WORKING, LLC
17 18 19 20 21	FEDERAL TRADE COMMISSION,  Plaintiff,  v.  REVMOUNTAIN, LLC, et al.,	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT ABSOLUTELY WORKING, LLC
17 18 19 20 21 22	FEDERAL TRADE COMMISSION,  Plaintiff,  v.  REVMOUNTAIN, LLC, et al.,  Defendants.	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT ABSOLUTELY WORKING, LLC  ropounds the following First Set of
17 18 19 20 21 22 23	FEDERAL TRADE COMMISSION,  Plaintiff,  v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, processing processing and processing processi	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT ABSOLUTELY WORKING, LLC  ropounds the following First Set of ag, LLC pursuant to Rules 26 and 33 of the
17 18 19 20 21 22 23 24	FEDERAL TRADE COMMISSION,  Plaintiff,  v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, procession, proces	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT ABSOLUTELY WORKING, LLC  ropounds the following First Set of ag, LLC pursuant to Rules 26 and 33 of the ons herein are provided for guidance and to
17 18 19 20 21 22 23 24 25	FEDERAL TRADE COMMISSION,  Plaintiff,  v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, procedure to Defendant Absolutely Working Federal Rules of Civil Procedure. The Definition	Case No: 17-cv-02000-APG-GWF  PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT ABSOLUTELY WORKING, LLC  ropounds the following First Set of ag, LLC pursuant to Rules 26 and 33 of the ons herein are provided for guidance and to regarding the specific interrogatories set forth

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Procedure 33(b)(2), Absolutely Working, LLC must serve the Commission with its responses under oath to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant Absolutely Working, LLC is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

#### **DEFINITIONS**

- A. "Defendants" means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.
  - B. "Identify," "identifying," and "identification" mean:
    - When referring to a natural person, state the full name, present business
      address and telephone number, or if a present business affiliation or
      business address is not known, by the last known business and home
      addresses and business and home telephone numbers;

- 2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and
- 3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.
- C. "You" and "Your" mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

- 1. Describe the business activities You engage in.
- 2. Identify all of Your members.
- 3. Identify all of Your officers.
- 4. Identify all of Your employees.
- 5. Identify all products or services You marketed or sold.
- 6. Identify all suppliers from which You obtained any goods You marketed or sold to consumers.
  - 7. Identify all of the websites You used to market or sell products or services.
- 8. Identify all of the customer relationship management systems You used to manage Your relationships and interactions with customers and potential customers.
- 9. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.
  - 10. Identify any contracts You have with other Defendants.

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11.	Identify any contracts You have with non-Defendants including suppliers, affiliate
marketers, at	ffiliate networks, providers of customer relationship management products or
services, wel	b hosting companies, call center providers, telemarketers, companies providing
chargeback 1	management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo,
RevGuard, L	LC, and RevLive!, LLC.

- 12. State the total amount of revenue You earned in each year since January 1, 2010, divided either into periods running from January 1 through December 31 of each year, or into fiscal years as You observed them.
- 13. Identify all sources of Your revenue since January 1, 2010, including by categorizing revenues as obtained from either consumers or businesses, and by identifying each business from which You obtained revenue.
- 14. State the amount of refunds and chargebacks You have paid to consumers since January 1, 2010.
- 15. Describe Your policies or practices for maintaining copies of marketing websites, including the location and form in which such copies are stored.
- 16. Identify all employees with responsibilities related to designing Your marketing websites.
- 17. Identify the percentage of Your revenues obtained from other Defendants in each year or fiscal year since Your formation.

Dated: November 3, 2017

Interrogatories to RoadRunner B2C, LLC, d/b/a RevGo

1	DAVID C. SHONKA
2	Acting General Counsel SARAH WALDROP
3	MICHELLE SCHAEFER Attorneys
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8	STEVEN W. MYHRE Acting United States Attorney
9	BLAINE T. WELSH
10	Assistant United States Attorney Nevada Bar No. 4790 501 Les Veres Plyd South Suite 1100
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13	Email: blaine.welsh@usdoj.gov
14	Attorneys for Plaintiff Federal Trade Commission.
15	UNITED STATES DISTRICT COURT
16	DISTRICT OF NEVADA
17	
18	FEDERAL TRADE COMMISSION, ) Case No: 17-cv-02000-APG-GWF
19	Plaintiff, )
20	v. ) PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT  POARRYNINE PAGE 11 C ASIA DEFENDANT
21	REVMOUNTAIN, LLC, et al.,  ) ROADRUNNER B2C, LLC, ASLO D/B/A ) REVGO
22	Defendants. )
23	Plaintiff, Federal Trade Commission, propounds the following First Set of
24	
25	Interrogatories to Defendant Roadrunner B2C, LLC, also d/b/a RevGo ("RevGo") pursuant to
26	Rules 26 and 33 of the Federal Rules of Civil Procedure. The Definitions herein are provided
27	for guidance and to reduce the likelihood of any misunderstanding regarding the specific interrogatories set forth below, and are not intended to increase the burden otherwise imposed

by the Federal Rules of Civil Procedure upon the defendant as the responding party. Pursuant to 1 Federal Rule of Civil Procedure 33(b)(2), RevGo must serve the Commission with its responses 2 under oath to these interrogatories, including any objections thereto, on or before December 4, 3 2017. Furthermore, Defendant RevGo is hereby notified that the FTC may move at the 4 commencement of trial to preclude Defendants from presenting evidence regarding responsive 5 matters they have failed to disclose in response to the FTC's requests for interrogatory 6 responses. 7 8 **DEFINITIONS** A. 9 "Defendants" means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak 10 Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely 11 Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, 12 LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; 13 RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis 14 Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; 15 16 Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; 17 Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, 18 LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC;

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- Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone 20
- Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class 21
- 22 Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile
- Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, 23
- LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer 24
- Johnson; and Danielle Foss. 25

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- "Identify," "identifying," and "identification" mean: B.
  - 1. When referring to a natural person, state the full name, present business address and telephone number, or if a present business affiliation or

- business address is not known, by the last known business and home addresses and business and home telephone numbers;
- 2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and
- 3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.
- C. "You" and "Your" mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

- 1. Describe the business activities You engage in.
- 2. Identify all of Your members.
- 3. Identify all of Your officers.
- 4. Identify all of Your employees.
- 5. Identify all products or services You marketed or sold.
- 6. Identify all of Your websites used to market or sell products or services.
- 7. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.
  - 8. Identify any contracts You entered with other Defendants.
- 9. Identify any contracts You have with non-Defendants including suppliers, affiliate marketers, affiliate networks, providers of customer relationship management products or

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services, web hosting companies, call center providers, telemarketers, companies providing chargeback management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo, RevGuard, LLC, and RevLive!, LLC.

- 10. State the total amount of revenue You have earned in each year since January 1, 2010, divided either into periods running from January 1 through December 31 of each year, or into fiscal years as You observed them.
- 11. Identify all sources of Your revenue since January 1, 2010, including by categorizing revenues as obtained from either consumers or businesses, and by identifying each business from which You obtained revenue.
- 12. Identify all of Your clients since January 1, 2010, including the individual(s) who served as points of contact for that client.
- 13. Identify the percentage of revenues You obtained from the other Defendants in each year or fiscal year since January 1, 2010.

Dated: November 3, 2017

Interrogatories to RevGuard, LLC

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8	STEVEN W. MYHRE	
9	Acting United States Attorney BLAINE T. WELSH	
10	Assistant United States Attorney Nevada Bar No. 4790	
11	501 Las Vegas Blvd. South, Suite 1100 Las Vegas, Nevada 89101	
12	Phone: 702-388-6336 Facsimile: 702-388-6787	
13	Email: blaine.welsh@usdoj.gov	
14	Attorneys for Plaintiff Federal Trade Commiss	ion.
15		
16	UNITED STATES	DISTRICT COURT
	DISTRICT	OF NEVADA
17		
17	FEDERAL TRADE COMMISSION,	) Casa No: 17 av 02000 APG GWE
18	FEDERAL TRADE COMMISSION, Plaintiff,	) Case No: 17-cv-02000-APG-GWF
18 19		) ) ) PLAINTIFF FTC'S FIRST SET OF
18 19 20	Plaintiff,	) )
18 19 20 21	Plaintiff, v.	) ) ) ) PLAINTIFF FTC'S FIRST SET OF ) INTERROGATORIES TO DEFENDANT
18 19 20	Plaintiff, v.  REVMOUNTAIN, LLC, et al.,  Defendants.	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC
18 19 20 21	Plaintiff, v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, p.	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC  ropounds the following First Set of
18 19 20 21 22	Plaintiff, v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, p.  Interrogatories to Defendant RevGuard, LLC p.	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC  ropounds the following First Set of ursuant to Rules 26 and 33 of the Federal Rules
18 19 20 21 22 23	Plaintiff, v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, p.	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC  ropounds the following First Set of ursuant to Rules 26 and 33 of the Federal Rules
18 19 20 21 22 23 24	Plaintiff, v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, p.  Interrogatories to Defendant RevGuard, LLC p.	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC  ropounds the following First Set of ursuant to Rules 26 and 33 of the Federal Rules provided for guidance and to reduce the
18 19 20 21 22 23 24 25	Plaintiff, v.  REVMOUNTAIN, LLC, et al.,  Defendants.  Plaintiff, Federal Trade Commission, p.  Interrogatories to Defendant RevGuard, LLC p. of Civil Procedure. The Definitions herein are	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC  ropounds the following First Set of ursuant to Rules 26 and 33 of the Federal Rules provided for guidance and to reduce the he specific interrogatories set forth below, and
18 19 20 21 22 23 24 25 26	Plaintiff, v.  REVMOUNTAIN, LLC, et al., Defendants.  Plaintiff, Federal Trade Commission, p. Interrogatories to Defendant RevGuard, LLC p. of Civil Procedure. The Definitions herein are likelihood of any misunderstanding regarding to	PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT REVGUARD, LLC  ropounds the following First Set of ursuant to Rules 26 and 33 of the Federal Rules provided for guidance and to reduce the he specific interrogatories set forth below, and se imposed by the Federal Rules of Civil

1	Procedure 33(b)(2), RevGuard, LLC must serve the Commission with its responses under oath
2	to these interrogatories, including any objections thereto, on or before December 4, 2017.
3	Furthermore, Defendant RevGuard, LLC is hereby notified that the FTC may move at the
4	commencement of trial to preclude Defendants from presenting evidence regarding responsive
5	matters they have failed to disclose in response to the FTC's requests for interrogatory
6	responses.
7	<u>DEFINITIONS</u>
8	A. "Defendants" means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a
9	RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak
10	Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely
11	Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River,
12	LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC;
13	RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis
14	Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC;
15	Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.;
16	Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC;
17	Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing,
18	LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC;
19	Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone
20	Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class
21	Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile
22	Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets,
23	LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer
24	Johnson; and Danielle Foss.
25	B. "Identify," "identifying," and "identification" mean:
26	1. When referring to a natural person, state the full name, present business
27	address and telephone number, or if a present business affiliation or
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- business address is not known, by the last known business and home addresses and business and home telephone numbers;
- 2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and
- 3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.
- C. "You" and "Your" mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

- 1. Describe the business activities You engage in.
- 2. Identify all of Your members.
- 3. Identify all of Your officers.
- 4. Identify all of Your employees.
- 5. Identify all products or services You marketed or sold.
- 6. Identify all websites You used to market or sell products or services.
- 7. Identify all of the customer relationship management systems You used to manage Your relationships and interactions with customers and potential customers.
- 8. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.
  - 9. Identify any contracts You with other Defendants.

- 10. Identify any contracts You have with non-Defendants including suppliers, affiliate marketers, affiliate networks, providers of customer relationship management products or services, web hosting companies, call center providers, telemarketers, companies providing chargeback management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo, RevGuard, LLC, and RevLive!, LLC.
- 11. State the total amount of revenue You have earned in each year since January 1, 2010, divided either into periods running from January 1 through December 31 of each year, or into fiscal years as You observed them.
- 12. Identify all sources of Your revenue since January 1, 2010, including by categorizing revenues as obtained from either consumers or businesses, and by identifying each business from which You obtained revenue.
- 13. Identify all of Your clients since January 1, 2010, including the individual(s) who served as points of contact for that client.
- 14. Identify the percentage of revenues You obtained from other Defendants in each year or fiscal year since January 1, 2010.

Dated: November 3, 2017

Interrogatories to RevLive!, LLC

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3	MICHELLE SCHAEFER Attorneys	
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8	STEVEN W. MYHRE Acting United States Attorney	
9	BLAINE T. WELSH Assistant United States Attorney	
10	Nevada Bar No. 4790 501 Las Vegas Blvd. South, Suite 1100	
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13	Email: blaine.welsh@usdoj.gov	ion
14	Attorneys for Plaintiff Federal Trade Commiss	ion.
15	LINUTED STATES	DISTRICT COURT
16		
17		OF NEVADA
18	FEDERAL TRADE COMMISSION,	) Case No: 17-cv-02000-APG-GWF
19	Plaintiff,	) )
20	V.	) PLAINTIFF FTC'S FIRST SET OF ) INTERROGATORIES TO DEFENDANT
21	REVMOUNTAIN, LLC, et al.,	REVLIVE!, LLC
22	Defendants.	) )
23	Plaintiff, Federal Trade Commission, p	ropounds the following First Set of
24	Interrogatories to Defendant RevLive!, LLC po	ursuant to Rules 26 and 33 of the Federal Rules of
25	Civil Procedure. The Definitions herein are pr	ovided for guidance and to reduce the likelihood
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	of any misunderstanding regarding the specific	interrogatories set forth below, and are not
27	of any misunderstanding regarding the specific intended to increase the burden otherwise impo	
27 28		osed by the Federal Rules of Civil Procedure

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33(b)(2), RevLive!, LLC must serve the Commission with its responses under oath to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant RevLive!, LLC is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

#### **DEFINITIONS**

- A. "Defendants" means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.
  - B. "**Identify**," "identifying," and "identification" mean:
    - When referring to a natural person, state the full name, present business
      address and telephone number, or if a present business affiliation or
      business address is not known, by the last known business and home
      addresses and business and home telephone numbers;

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- 2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and
- 3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.
- C. "You" and "Your" mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

## <u>INTERROGATORIES</u>

- 1. Describe the business activities You engage in.
- 2. Identify all of Your members.
- 3. Identify all of Your officers.
- 4. Identify all of Your employees.
- 5. Identify all products or services Your marketed or sold.
- 6. Identify all websites You used to market or sell products or services.
- 7. Identify all of the customer relationship management systems You used to manage Your relationships and interactions with customers and potential customers.
- 8. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.
  - 9. Identify any contracts You entered with other Defendants.
- 10. Identify any contracts You have with non-Defendants including suppliers, affiliate marketers, affiliate networks, providers of customer relationship management products or

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services, web hosting companies, call center providers, telemarketers, companies providing chargeback management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo, RevGuard, LLC, and RevLive!, LLC.

- 11. Identify all of Your clients since January 1, 2010, including the individual(s) who served as points of contact for that client.
- 12. State the total amount of revenue You have earned in each year since January 1, 2010, divided either into periods running from January 1 through December 31 of each year, or into fiscal years as You observed them.
- 13. Identify all sources of Your revenue since January 1, 2010, including by categorizing revenues as obtained from either consumers or businesses, and by identifying each business from which You obtained revenue.
- 14. Describe Your policies or practices for recording telephone calls from consumers, including retention policies for the recordings.
- 15. Identify all employees with responsibilities related to reviewing or responding to consumer complaints.
- 16. Identify all employees with responsibilities related to drafting or editing call scripts.
- 17. Identify all of Your clients since January 1, 2010, including the individual(s) who served as points of contact for that client.
- 18. Identify the percentage of revenues You obtained from the other Defendants in each year or fiscal year since January 1, 2010.

Dated: November 3, 2017

Interrogatories to Blair McNea

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	UNITED STATES	DISTRICT COURT
16		OF NEVADA
16 17		OF NEVADA
17 18	DISTRICT	
17 18 19	DISTRICT FEDERAL TRADE COMMISSION,	OF NEVADA  ) Case No: 17-cv-02000-APG-GWF ) PLAINTIFF FTC'S FIRST SET OF
17 18 19 20	DISTRICT FEDERAL TRADE COMMISSION, Plaintiff,	OF NEVADA  ) Case No: 17-cv-02000-APG-GWF )
17 18 19 20 21	DISTRICT FEDERAL TRADE COMMISSION, Plaintiff, v.	OF NEVADA  ) Case No: 17-cv-02000-APG-GWF ) PLAINTIFF FTC'S FIRST SET OF INTERROGATORIES TO DEFENDANT
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33(b)(2), Blair McNea must serve the Commission with its responses to these interrogatories, 1 including any objections thereto, on or before December 4, 2017. Furthermore, Defendant Blair 2 McNea is hereby notified that the FTC may move at the commencement of trial to preclude 3 Defendants from presenting evidence regarding responsive matters they have failed to disclose 4 in response to the FTC's requests for interrogatory responses. 5 **DEFINITIONS** 6 A. "Defendants" means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a 7 8 RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak 9 Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, 10 LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; 11 RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis 12 Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; 13 Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; 14 Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; 15 16 Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; 17 Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone 18 19 Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile 20 Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, 21 LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer 22 Johnson; and Danielle Foss. 23 В. "Identify," "identifying," and "identification" mean: 24 1. When referring to a natural person, state the full name, present business 25 address and telephone number, or if a present business affiliation or 26 business address is not known, by the last known business and home 27 addresses and business and home telephone numbers; 28

- 2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and
- 3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.
- C. "You" and "Your" mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

- 1. Describe the relationship between You and the other Defendants. For example, state whether You own a portion of any Defendant (and if so, identify such Defendant and Your percentage ownership stake in it), conduct business with any Defendant, or have contracts with any Defendant.
  - 2. Identify any contracts You entered with other Defendants.
- 3. State the total amount of revenue You have earned in each year since January 1, 2010, divided either into periods running from January 1 through December 31 of each year, or into fiscal years as XXXX observed them.
- 4. Identify all sources of Your revenue since January 1, 2010, including by categorizing revenues as obtained from either consumers or businesses, and by identifying each business from which You obtained revenue.

## Case 2:17-cv-02000-APG-GWF Document 92-1 Filed 11/22/17 Page 26 of 26